

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MORAN INDUSTRIES, INC. )  
                            )  
Plaintiff,               )     No. 07 C 6171  
v.                        )  
                            )  
JOHN HEIDEMAN and KILIMANJHARO )  
EQUITY INVESTMENTS, LLC,     )  
                            )  
Defendants.              )

**NOTICE OF MOTION**

TO: Mr. Andrew P. Bleiman  
Cheng Cohen, LLC  
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On February 12, 2008 at 9:30 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Joan Humphrey Lefkow, or any judge sitting in her stead, room 1925 of the Federal Building at 219 S. Dearborn Street, Chicago, Illinois and shall then and there present the attached MOTION FOR STAY.

Respectfully Submitted,  
By: s/ Brian P. Mack  
ARDC 6255657  
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**Certificate of Service**

I hereby certify that on January 28, 2008, a copy of foregoing DEFENDANT'S MOTION FOR STAY was filed electronically. Notice of this filing will be sent by operation of the Court's Electronic Filing System to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

s/ James Tragos  
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